Appendix A to the Declaration of E. Evans Wohlforth, Esq.

Document Title/ECF No.	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Re- lief is Not Granted	Why a Less Restrictive Alternative to the Re- lief Sought is Not Avail- able	Any Prior Order Sealing the Same Materials in the Pending Action	Party in Opposition to Sealing, if any, and Basis
Letter dated April 17, 2024 [ECF No. 253]	Letter motion discusses in detail, including by reference to internal communications and agreements, the role of Save On SP, LLC's ("SaveOn") Corporate Counsel and Chief Compliance Officer, Darcie Falsioni. The letter specifically discusses the input Ms. Falsioni had into SaveOn's business and marketing strategy, comprising proprietary business information. See ECF No. 253.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	A redacted, public version of the Letter is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 1 to Letter dated April 17, 2024 [ECF No. 253]	Exhibit 1 is an email chain between Falsioni, a health plan, and SaveOn employees, discussing SaveOn's business strategy, comprising	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business in- formation.	No	No objection

	proprietary business information. <i>See</i> ECF No. 253 at Ex. 1.	be disclosed to competi- tors and other market participants.			
Exhibit 2 to Letter dated April 17, 2024 [ECF No. 253]	Exhibit 2 is an email chain between Falsioni, a health plan, and SaveOn employees communicating about and sending a contract outlining the business relationship between SaveOn and the health plan client, comprising proprietary business information. <i>See</i> ECF No. 253 at Ex. 2.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 3 to Letter dated April 17, 2024 [ECF No. 253]	Exhibit 3 is an email chain between Falsioni, a health plan, Express Scripts, Inc. employees, and SaveOn employees communicating about and sending a contract outlining the business relationship between SaveOn and the health plan client, comprising proprietary business information. <i>See</i> ECF No. 253 at Ex. 3.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 4 to Letter dated April	Exhibit 4 is an email chain between Falsioni, a health plan, Express	If relief is not granted, SaveOn would be at a competitive disadvantage	It is believed that no less restrictive alternative is available to prevent the	No	No objection

17, 2024 [ECF No. 253]	Scripts, Inc. employees, and SaveOn employees communicating about and sending a contract outlining the business relationship between SaveOn and the health plan client, comprising proprietary business information. <i>See</i> ECF No. 253 at Ex. 4.	should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	disclosure of SaveOn's proprietary business information.		
Exhibit 5 to Letter dated April 17, 2024 [ECF No. 253]	Exhibit 5 is an email chain between Falsioni, a health plan, Express Scripts, Inc. employees, and SaveOn employees communicating about and sending a contract outlining the business relationship between SaveOn and the health plan client, comprising proprietary business information. <i>See</i> ECF No. 253 at Ex. 5.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 6 to Letter dated April 17, 2024 [ECF No. 253]	Exhibit 6 is a chart sent by SaveOn to health plan clients showing all the contracts and documents to be signed to enter into a business relationship with SaveOn, comprising proprietary business	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business in- formation.	No	No objection

	information. <i>See</i> ECF No. 253 at Ex. 6.	be disclosed to competi- tors and other market participants.			
Exhibit 7 to Letter dated April 17, 2024 [ECF No. 253]	Exhibit 7 is a chart sent by SaveOn to health plan clients showing all the contracts and documents to be signed to enter into a business relationship with SaveOn, comprising proprietary business information. <i>See</i> ECF No. 253 at Ex. 7.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 8 to Letter dated April 17, 2024 [ECF No. 253]	Exhibit 8 is an email chain between Falsioni, a health plan, Express Scripts, Inc. employees, and SaveOn employees communicating about and sending a contract outlining the business relationship between SaveOn and the health plan client, comprising proprietary business information. <i>See</i> ECF No. 253 at Ex. 8.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 9 to Letter dated April 17, 2024 [ECF No. 253]	Exhibit 9 is an email chain between Falsioni, a health plan, Express Scripts, Inc. employees, and SaveOn employees communicating about	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection

	and sending a contract outlining the business relationship between SaveOn and the health plan client, comprising proprietary business information. <i>See</i> ECF No. 253 at Ex. 9.	be disclosed to competitors and other market participants.			
Exhibit 10 to Letter dated April 17, 2024 [ECF No. 253]	Exhibit 10 is an email chain between Falsioni, Accredo employees, Express Scripts, Inc. employees, and SaveOn employees communicating about and sending a contract outlining the business relationship between SaveOn and a health plan client, comprising proprietary business information. See ECF No. 253 at Ex. 10.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 11 to Letter dated April 17, 2024 [ECF No. 253]	Exhibit 11 is an email chain between Falsioni, a health plan, Express Scripts, Inc. employees, and SaveOn employees communicating about and sending a contract outlining the business relationship between SaveOn and the health	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection

Exhibit 12 to Letter dated April 17, 2024	plan client, comprising proprietary business information. <i>See</i> ECF No. 253 at Ex. 11. Exhibit 12 is an email chain between Falsioni, counsel for a health plan client, Express Scripts,	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's	No	No objection
[ECF No. 253]	Inc. employees, and SaveOn employees communicating about and sending a contract outlining the business relationship between SaveOn and the health plan client, comprising proprietary business information. <i>See</i> ECF No. 253 at Ex. 12.	non-public business information and strategy be disclosed to competitors and other market participants.	proprietary business information.		
Exhibit 13 to Letter dated April 17, 2024 [ECF No. 253]	Exhibit 13 is an email chain between Falsioni, a health plan, Express Scripts, Inc. employees, and SaveOn employees communicating about and sending a contract outlining the business relationship between SaveOn and the health plan client, comprising proprietary business information. <i>See</i> ECF No. 253 at Ex. 13.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection

Exhibit 14 to Letter dated April 17, 2024 [ECF No. 253]	Exhibit 14 is an email chain between Falsioni, a health plan, and SaveOn employees communicating about and sending a contract outlining the business relationship between SaveOn and the health plan client, comprising proprietary business information. <i>See</i> ECF No. 253 at Ex. 14.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 15 to Letter dated April 17, 2024 [ECF No. 253]	Exhibit 15 is an email chain between Falsioni, a health plan, Accredo employees, and SaveOn employees communicating about SaveOn's updated drug lists, comprising proprietary business information. See ECF No. 253 at Ex. 15.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 16 to Letter dated April 17, 2024 [ECF No. 253]	Exhibit 16 is an Express Scripts, Incbranded slide about SaveOn's business model, comprising proprietary business information. See ECF No. 253 at Ex. 16.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection

Exhibit 17 to Letter dated April 17, 2024 [ECF No. 253]	Exhibit 17 is an email chain between Falsioni, a health plan, Express Scripts, Inc. employees, and SaveOn employees communicating about the business relationship and contract between SaveOn and the health plan client, comprising proprietary business information. <i>See</i> ECF No. 253 at Ex. 17.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 18 to Letter dated April 17, 2024 [ECF No. 253]	Exhibit 18 is a text exchange between Falsioni and other SaveOn employees, including CEO Jody Miller. The exchange discusses SaveOn's marketing strategy, comprising proprietary business information. See ECF No. 253 at Ex. 18.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 19 to Letter dated April 17, 2024 [ECF No. 253]	Exhibit 19 is an email exchange between SaveOn and a health plan client, discussing drug manufacturer terms and conditions and SaveOn's business model's relationship with those	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection

Exhibit 20 to Letter dated April 17, 2024 [ECF No. 253]	T&Cs, comprising proprietary business information. See ECF No. 253 at Ex. 19. Exhibit 20 is a Master Program Agreement between SaveOn and Express Scripts, Inc. setting forth their business relationship, comprising proprietary business information. See ECF No. 253 at Ex. 20.	be disclosed to competitors and other market participants. If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 21 to Letter dated April 17, 2024 [ECF No. 253]	Exhibit 21 is an email exchange between SaveOn, Express Scripts, Inc., and Accredo employees discussing SaveOn's business strategy and marketing materials, comprising proprietary business information. <i>See</i> ECF No. 253 at Ex. 21.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 22 to Letter dated April 17, 2024 [ECF No. 253]	Exhibit 22 is an email exchange between SaveOn, Express Scripts, Inc., and a health plan client, discussing the client's plan requirements and how those requirements relate	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection

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	to SaveOn's business	be disclosed to competi-			
	model, comprising	tors and other market			
	proprietary business	participants.			
	information. See ECF				
	No. 253 at Ex. 22.				
Exhibit 23	Exhibit 23 is an email	If relief is not granted,	It is believed that no less	No	No objection
to Letter	exchange between	SaveOn would be at a	restrictive alternative is		
dated April	SaveOn, Express Scripts,	competitive disadvantage	available to prevent the		
17, 2024	Inc., and a health plan	should its proprietary	disclosure of SaveOn's		
[ECF No.	client, discussing the	non-public business in-	proprietary business in-		
253]	client's plan	formation and strategy	formation.		
_	requirements and how	be disclosed to competi-			
	those requirements relate	tors and other market			
	to SaveOn's business	participants.			
	model, comprising				
	proprietary business				
	information. See ECF				
	No. 253 at Ex. 23.				
Exhibit 24	Exhibit 24 is an email	If relief is not granted,	It is believed that no less	No	No objection
to Letter	exchange between	SaveOn would be at a	restrictive alternative is		,
dated April	SaveOn, Express Scripts,	competitive disadvantage	available to prevent the		
17, 2024	Inc., and a health plan	should its proprietary	disclosure of SaveOn's		
[ECF No.	client, discussing the	non-public business in-	proprietary business in-		
253]	client's plan	formation and strategy	formation.		
233]	requirements and how	be disclosed to competi-	Tormation.		
	those requirements relate	tors and other market			
	to SaveOn's business	participants.			
	model, comprising	participants.			
	proprietary business				
	information. See ECF				
	No. 253 at Ex. 24.				
Exhibit 25	Exhibit 25 is an email	If relief is not granted,	It is believed that no less	No	No objection
to Letter	exchange between	SaveOn would be at a	restrictive alternative is		Ŭ

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dated April 17, 2024 [ECF No. 253]	SaveOn, Express Scripts, Inc., and a health plan client discussing SaveOn's business strategy, including specifics of its "Adapt" services, comprising proprietary business information. See ECF No. 253 at Ex. 25.	competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	available to prevent the disclosure of SaveOn's proprietary business information.		
Exhibit 27 to Letter dated April 17, 2024 [ECF No. 253]	Exhibit 27 is an email exchange between SaveOn and a health plan client discussing SaveOn's business practices and relationship with plans and patients, including specifics of SaveOn's coinsurance model works with the Affordable Care Act, comprising proprietary business information. See ECF No. 253 at Ex. 27.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 28 to Letter dated April 17, 2024 [ECF No. 253]	Exhibit 28 is an email chain between Falsioni, a health plan, Express Scripts, Inc. employees, and SaveOn employees communicating about the business relationship and contract between SaveOn	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business in- formation.	No	No objection

	and the health plan client, comprising proprietary business information. <i>See</i> ECF No. 253 at Ex. 28.	be disclosed to competitors and other market participants.			
Letter dated April 29, 2024 [ECF No. 326]	Letter motion references SaveOn's relationship with its clients, including specific quotes from contracts defining SaveOn's relationship with health plans and Express Scripts, Inc., comprising proprietary business information. See ECF No. 326.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	A redacted, public version of the Letter is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 2 to Letter dated April 29, 2024 [ECF No. 326]	Exhibit 2 is a contract between SaveOn and a health plan partner. Exhibit 2 sets out the business relationship between SaveOn and its clients, comprising proprietary business information, <i>See</i> ECF No. 326 at Ex. 2.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 3 to Letter dated April 29, 2024 [ECF No. 326]	Exhibit 3 is an email chain between Falsioni, a health plan, Express Scripts, Inc. employees, and SaveOn employees communicating about the business relationship and	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection

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	contract between SaveOn and the health plan client, comprising proprietary business information. See ECF	be disclosed to competitors and other market participants.			
Exhibit 4 to Letter dated April 29, 2024 [ECF No. 326]	No. 326 at Ex. 3. Exhibit 4 is a contract between SaveOn and a health plan partner. Exhibit 4 sets out the business relationship between SaveOn and its clients, comprising proprietary business information, See ECF	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 5 to Letter dated April 29, 2024 [ECF No. 326]	No. 326 at Ex. 4. Exhibit 5 is an email chain between Falsioni, a health plan, Express Scripts, Inc. employees, and SaveOn employees communicating about the business relationship and contract between SaveOn and the health plan client, comprising proprietary business information. See ECF No. 326 at Ex. 5.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 6 to Letter dated April 29, 2024	Exhibit 6 is a contract between SaveOn, Express Scripts, Inc., and a health plan partner.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's	No	No objection

[ECF No. 326]	Exhibit 6 sets out the business relationship between SaveOn and its clients, comprising proprietary business information. See ECF	non-public business information and strategy be disclosed to competitors and other market participants.	proprietary business information.		
Exhibit 7 to Letter dated April 29, 2024 [ECF No. 326]	No. 326 at Ex. 6. Exhibit 7 is an email chain between Falsioni, a health plan, Express Scripts, Inc. employees, and SaveOn employees communicating about the business relationship and contract between SaveOn and the health plan client, comprising proprietary business information. See ECF No. 326 at Ex. 7.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 8 to Letter dated April 29, 2024 [ECF No. 326]	Exhibit 8 is a contract between SaveOn and a health plan partner. Exhibit 8 sets out the business relationship between SaveOn and its clients, comprising proprietary business information. <i>See</i> ECF No. 326 at Ex. 8.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 9 to Letter dated April	Exhibit 9 is a contract between SaveOn and a health plan partner.	If relief is not granted, SaveOn would be at a competitive disadvantage	It is believed that no less restrictive alternative is available to prevent the	No	No objection

29, 2024 [ECF No. 326]	Exhibit 9 sets out the business relationship between SaveOn and its clients, comprising proprietary business information. <i>See</i> ECF No. 326 at Ex. 9.	should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	disclosure of SaveOn's proprietary business information.		
Exhibit 10 to Letter dated April 29, 2024 [ECF No. 326]	Exhibit 10 is a contract between SaveOn and a health plan partner. Exhibit 10 sets out the business relationship between SaveOn and its clients, comprising proprietary business information. See ECF No. 326 at Ex. 10.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 11 to Letter dated April 29, 2024 [ECF No. 326]	Exhibit 11 is a contract between SaveOn and a health plan partner. Exhibit 11 sets out the business relationship between SaveOn and its clients, comprising proprietary business information. See ECF No. 326 at Ex. 11.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 12 to Letter dated April 29, 2024 [ECF No. 326]	Exhibit 12 is a contract between SaveOn, Express Scripts, Inc., and a health plan partner. Exhibit 12 sets out the business relationship	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection

1	between SaveOn and its	he disaloged to some sti			
		be disclosed to competi- tors and other market			
	clients, comprising				
	proprietary business	participants.			
	information. See ECF				
F 131 12	No. 326 at Ex. 12.	70 11 01		27	AT 11
Exhibit 13	Exhibit 13 is a contract	If relief is not granted,	It is believed that no less	No	No objection
to Letter	between SaveOn,	SaveOn would be at a	restrictive alternative is		
dated April	Express Scripts, Inc., and	competitive disadvantage	available to prevent the		
29, 2024	a health plan partner.	should its proprietary	disclosure of SaveOn's		
[ECF No.	Exhibit 6 sets out the	non-public business in-	proprietary business in-		
326]	business relationship	formation and strategy	formation.		
	between SaveOn and its	be disclosed to competi-			
	clients, comprising	tors and other market			
	proprietary business	participants.			
	information. See ECF				
	No. 326 at Ex. 13.				
Exhibit 14	Exhibit 14 is an email	If relief is not granted,	It is believed that no less	No	No objection
to Letter	chain between Falsioni, a	SaveOn would be at a	restrictive alternative is		
dated April	health plan, Express	competitive disadvantage	available to prevent the		
29, 2024	Scripts, Inc. employees,	should its proprietary	disclosure of SaveOn's		
[ECF No.	and SaveOn employees	non-public business in-	proprietary business in-		
326]	communicating about the	formation and strategy	formation.		
	business relationship and	be disclosed to competi-			
	contract between SaveOn	tors and other market			
	and the health plan	participants.			
	-				
	, 1				
	information. See ECF				
	No. 326 at Ex. 14.				
Exhibit 15	Exhibit 15 is a contract	If relief is not granted.	It is believed that no less	No	No objection
to Letter	between SaveOn and a		restrictive alternative is		,
29, 2024	Exhibit 15 sets out the	should its proprietary			
to Letter dated April 29, 2024 [ECF No. 326] Exhibit 15 to Letter dated April	chain between Falsioni, a health plan, Express Scripts, Inc. employees, and SaveOn employees communicating about the business relationship and contract between SaveOn and the health plan client, comprising proprietary business information. <i>See</i> ECF No. 326 at Ex. 14. Exhibit 15 is a contract between SaveOn and a health plan partner.	SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants. If relief is not granted, SaveOn would be at a competitive disadvantage	restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.		No objection No objection

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[ECF No.	business relationship	non-public business in-	proprietary business in-		
326]	between SaveOn and its	formation and strategy	formation.		
	clients, comprising	be disclosed to competi-			
	proprietary business	tors and other market			
	information. See ECF	participants.			
	No. 326 at Ex. 15.				
Exhibit 16	Exhibit 16 is an email	If relief is not granted,	It is believed that no less	No	No objection
to Letter	chain between Falsioni, a	SaveOn would be at a	restrictive alternative is		
dated April	health plan, Express	competitive disadvantage	available to prevent the		
29, 2024	Scripts, Inc. employees,	should its proprietary	disclosure of SaveOn's		
[ECF No.	and SaveOn employees	non-public business in-	proprietary business in-		
326]	communicating about the	formation and strategy	formation.		
	business relationship and	be disclosed to competi-			
	contract between SaveOn	tors and other market			
	and the health plan	participants.			
	client, comprising				
	proprietary business				
	information. See ECF				
	No. 326 at Ex. 16.				
Exhibit 17	Exhibit 17 is a contract	If relief is not granted,	It is believed that no less	No	No objection
to Letter	between SaveOn and a	SaveOn would be at a	restrictive alternative is		
dated April	health plan partner.	competitive disadvantage	available to prevent the		
29, 2024	Exhibit 17 sets out the	should its proprietary	disclosure of SaveOn's		
[ECF No.	business relationship	non-public business in-	proprietary business in-		
326]	between SaveOn and its	formation and strategy	formation.		
	clients, comprising	be disclosed to competi-			
	proprietary business	tors and other market			
	information, See ECF	participants.			
	No. 326 at Ex. 17.				
Exhibit 18	Exhibit 18 is a contract	If relief is not granted,	It is believed that no less	No	No objection
to Letter	between SaveOn and a	SaveOn would be at a	restrictive alternative is		
dated April	health plan partner.	competitive disadvantage	available to prevent the		
29, 2024	Exhibit 18 sets out the	should its proprietary	disclosure of SaveOn's		

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[ECF No.	business relationship	non-public business in-	proprietary business in-		
326]	between SaveOn and its	formation and strategy	formation.		
	clients, comprising	be disclosed to competi-			
	proprietary business	tors and other market			
	information. See ECF	participants.			
	No. 326 at Ex. 18.				
Exhibit 19	Exhibit 18 is a contract	If relief is not granted,	It is believed that no less	No	No objection
to Letter	between SaveOn and a	SaveOn would be at a	restrictive alternative is		
dated April	health plan partner.	competitive disadvantage	available to prevent the		
29, 2024	Exhibit 18 sets out the	should its proprietary	disclosure of SaveOn's		
[ECF No.	business relationship	non-public business in-	proprietary business in-		
326]	between SaveOn and its	formation and strategy	formation.		
	clients, comprising	be disclosed to competi-			
	proprietary business	tors and other market			
	information. See ECF	participants.			
	No. 326 at Ex. 18.				
Letter	Letter motion describes	If relief is not granted,	A redacted, public ver-	No	No objection
dated May	the role of Falsioni as	SaveOn would be at a	sion of the Letter is be-		
6, 2024	SaveOn's Corporate	competitive disadvantage	ing filed. It is believed		
[ECF No.	Counsel and Chief	should its proprietary	that no less restrictive al-		
278]	Compliance Officer,	non-public business in-	ternative is available to		
	comprising proprietary	formation and strategy	prevent the disclosure of		
	business information	be disclosed to competi-	SaveOn's proprietary		
	about SaveOn's structure	tors and other market	business information.		
	and outreach to clients.	participants.			
	See ECF No. 278.				